

Tilton Beldner LLP

www.tiltonbeldner.com

626 RXR Plaza
Uniondale, New York 11556
Tel.: (631) 629-5291
Fax: (516) 324-3170
etilton@tiltonbeldner.com

Via ECF

Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

October 5, 2022

Re: Pleitez Galicia v. Marielos Corp. et al.
No. 21-cv-6255(JGK)(OTW)

*Conference adjourned
to 10/20/22 at 2:30 P.M.
as ordered
per 6/Koeltl
10/5/22 U.S.D.*

Your Honor:

I represent the Defendants in the above matter. This matter is scheduled for a status conference for October 7, 2022. The conference surrounds the alleged breach of the settlement agreement. I respectfully request, with the consent of opposing counsel, that that conference be adjourned an additional two weeks, as the parties have come to an internal agreement regarding the remedy to the alleged breach that would obviate the need for the conference entirely.

In my last request to adjourn the original conference date to October 7, Defendants at that time believed they could remedy the alleged breach prior to the October 7 conference. This did not happen, as of yet, because my clients report that the funds needed to remedy the alleged breach are being held by their bank until approximately October 11, 2022, a contingency which was not accounted for in Defendants' last request to adjourn the conference. Once the bank releases the funds, Defendants will remedy the alleged breach by turning the funds over to the Plaintiff. This will ultimately obviate the need for any conference at all.

Thus, I respectfully request that the October 7 conference be adjourned to October 21, 2022, with the expectation that we will ultimately be requesting the Court to cancel the conference entirely because the alleged breach will have been remedied by that point.

Very truly yours,

s/ Eric S. Tilton
Eric S. Tilton

Cc via ECF: All counsel of record